



September 12, 2023

Secretary Gina Raimondo
Attn: Wendy Morrison
U.S. Department of Commerce 1401 Constitution Ave NW, Room 13436
Washington, DC 20230

Re: NOAA-HQ-2023-0060 (National Standards 4, 8, 9)

Dear Secretary Raimondo:

Native Peoples Action (NPA) is a non-partisan organization dedicated to protecting and strengthening Alaska Native peoples and our Ways of Life. We are committed to addressing and restoring our peoples' inherent rights to hunt, fish, harvest, gather, trap, share, and have ceremony as well as manage and steward our homelands for abundance. Critical to this effort is our commitment to end the criminalization of our Native ways of life. We do this work by being a statewide advocate alongside our Native peoples amplifying their work, voices, and leadership, and advancing our collective priorities to fully practice, restore, and strengthen our Alaska Native hunting, fishing, gathering, harvesting, trapping, sharing and ceremonial rights as Native peoples.

Joining us are 212 Alaskans who call for updating National Standards 4, 8, & 9. The MSA guidelines must consider the impact of decisions on fishing communities throughout Alaska and the cultural genocide that will surely result if management guidelines are not changed. This is a great opportunity for NMFS to change the legacy of federal fisheries management in Alaska, which we all know, at status quo, is harming communities and threatening a way of life central to who we are as Native peoples.

Thank you for considering our comments. Revisions to the guidelines are urgently necessary. We look forward to working with NOAA to ensure sustainability for all species affected by federal fisheries. Please see our letter below.

Sincerely,

Laureli Ivanoff
Executive Director, Native Peoples Action

September 12, 2023

Dear Secretary Raimondo, Secretary Spinrad, Director Coit, and Deputy Assistant Rauch,

Alaska Native people have depended on salmon since time immemorial. Salmon has provided not just an alternative and sustainable economy for thousands of years, but a cultural way of life. We work to see that our cultural and economic reliance on salmon continues now and for future generations.

We are encouraged to see consideration to changes to the national standards to reflect equity, fishing communities, and reduction of bycatch in the federal fisheries.

It is unfortunate and unacceptable that for many years, communities who have relied on salmon now have empty smokehouses, while large scale commercial fishing operates with little to no restrictions. Along with salmon, other ocean resources including halibut, snow and red king crab, are severely impacted. Change is necessary.

We ask NOAA fisheries to update guidelines for National Standards 4, 8, and 9 to address current shortcomings in federal fisheries management that have resulted in inequities that have caused harm to our many communities.

We request that National Standard 4 include clarity around equity in fisheries. If no single group is allowed to have an excessive share of fishing privilege why do Indigenous communities continue to experience severe restrictions on subsistence salmon fishing while federal commercial fishing operators catch and discard Chinook, chum and other species by the thousands?

We request that National Standard 8 include not only the financial importance of fish to fishing communities, but the cultural and historic connection as well.

We request that National Standard 9 consider the holistic ecosystem approach to bycatch reduction, including other species and habitat, furthering the NOAA implementation of Ecosystem Based Fisheries Management.

We understand that fisheries management is complex and there are multifacets to the decline in returns, however, it is critical to address the compounding issues of bycatch and its impacts to communities across Alaska. Policy should prioritize equity for Indigenous fishing communities.

We thank you for your consideration.

Sincerely,

Michele Adams
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Karl Bergman
Fairbanks, AK

Jonathan Charlie
Toksook Bay, AK

Phyllis Adams
Anchorage, AK

Patricia Berkland
Fairbanks, AK

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Shanelle Afcan
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Harriet Blair
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Ramie Chung
King Cove, AK

Elizabeth Ahkivgak
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Leia Alessandrini
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